



# Greater Harris County 9-1-1 Emergency Network

---

March 20, 2017

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Notice of Ex Parte on Current Issues Challenging 9-1-1, 911 Call Forwarding Requirements for Non-Service-Initialized Phones, PS Docket No. 08-51; NASNA 911 Apps Request, RM Docket No. 11780; Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch:

On Wednesday March 1, 2017, Lavergne Schwender, Stan Heffernan, Vergil Ratliff, Sonya Clauson, and Tino Fonseca from the Greater Harris County 9-1-1 Emergency Network<sup>1</sup> (GHC 9-1-1) met with Zenji Nakazawa. The discussion centered on the following current issues challenging 9-1-1 entities.

## **Non-Service Initialized (NSI) Phones:**

NSI phones continue to challenge Public Safety Answering Points (PSAPs) in the Greater Harris County 9-1-1 Emergency Network (GHC 9-1-1) area. NSI calls are a growing burden and must be addressed if PSAPs are to provide acceptable service levels to the public. Our current reporting shows that they represent 10% of total call volume that is definitively recorded in the reporting systems. There is an additional 3% to 5% that have no identifying data element in the ALI, these are not included in the reports. This means that NSI call volumes may be most likely larger than the standard reporting tools are showing across the country. The Houston Emergency Center, the largest PSAP in the GHC 9-1-1 area, processes 10,000 9-1-1 calls daily and has to deal with 1,000 to 1,500 NSI calls daily.

Another concern is that these NSI numbers may most likely increase at a greater percentage with the penetration of smartphones and the more frequent upgrade habits of the consumer. These NSI phones now have a greater chance of being kept and used in households as multimedia devices over Wi-Fi (for activities, such as web surfing, watching movies, games, etc.). This may even further continue to increase the number of possible NSI devices and potential NSI 9-1-1 calls at a faster rate. The operational impact of these NSI 9-1-1 calls continues to have a growing negative impact on our centers abilities to process all other 9-1-1 sessions including text-to-911.

Recent in-person verification data gathering was performed at the Houston Emergency Center by GHC 9-1-1. This effort confirmed all NSI calls that have 911 as the area code in the ALI record. As mentioned above there were other inbound NSI calls that looked exactly like a normal wireless call. This inability to report on all NSI calls is mostly due to phones that have no service, but the provider continues to provide the calling number for an ALI bid. The second part of this data collection, summarized in the two tables below, was to categorize all observed NSI calls into four separate categories with further breakdown of the nuisance category.

---

<sup>1</sup> Greater Harris County 9-1-1 (GHC 9-1-1) is a Texas Emergency Communication District providing E9-1-1 service and public safety services. GHC is the largest 9-1-1 system in the state of Texas serving 5.4 million people. Emergency communication districts were created pursuant to Texas Health and Safety Code Chapter 772 and are defined under Texas Health and Safety Code § 771.001(3)(B).





Marlene Dortch, FCC  
March 10, 2107  
Page 2

#### Total NSI Calls

Abbv.	Category	Total
E	Emergency	0
U	Unintended	237
N	Nuisance	218
I	Informational	0
	<b>Total</b>	<b>455</b>

#### Further Breakdown of Nuisance Category

Abbv.	Nuisance Breakdown	Total
NH	Hang-Up	131
NAWO	Accidental (w/o voice)	47
NY	Youth Misuse	39
NPR	Pre-Recording	1
	<b>Total</b>	<b>218</b>

PSAP Mangers in the GHC 9-1-1 area have stated to us that NSI 9-1-1 calls actually needing emergency response happen so seldom they are difficult to even measure. This in-person verification appears to validate this fact with none of the 455 NSI calls needing emergency response.

GHC 9-1-1 in no way wants to inhibit any person from being able to access to 9-1-1 but with the growing numbers and the fact that there is no subscriber information or ability to place a callback, the service to the public is not adequate. The public should have better options now to obtain initialized devices allowing PSAPs to provide better service when emergency services are needed. With longer-to-process text-to-911 sessions and potentially other NG9-1-1 services impacting PSAPs, GHC 9-1-1 would like to see further effort to address and resolve the NSI issue.

#### Smartphone Apps:

The Year 2016 was a difficult year for 9-1-1 entities in the nation as it pertains to apps. Being one of the largest 9-1-1 systems in the nation, GHC 9-1-1 fielded many calls and needed to respond to the media on apps and how they interact with 9-1-1. There continues to be a lot of confusion on the need for a 9-1-1 app and what these apps can do to improve 9-1-1. GHC 9-1-1 has a fulltime 9-1-1 field tester who regularly tests wireless location accuracy and tests other device/routing matters. In the GHC 9-1-1 area, the wireless carriers have usually met or exceeded FCC mandates on wireless location accuracy. Some of the app developers claim to either get the caller to 9-1-1 faster or provide better/more exact caller location information to 9-1-1. In many cases these claims are either inaccurate or tend to mislead the public. GHC 9-1-1 always promotes improvements in technology that can improve the 9-1-1 system. The ability for wireless providers to provide the handset GPS location information to the PSAP's is long overdue. This ability should easily be inherent to all smartphones with no additional cost to the public or public safety.

#### NG 9-1-1

GHC 9-1-1 intends to start the transition away from the legacy 9-1-1 selective router in 2017. But it is imperative for NG 9-1-1 that a competitive choice-driven market is fostered and maintained. This will allow local, regional and state 9-1-1 entities to efficiently transition systems and services to meet their specific needs. One of the key things learned in our early deployment stages is the need for many egress network providers from Host/Data Center sites to the PSAPs. Ideally, no single network provider should be the only path in this new environment. GHC 9-1-1 currently has up to three wireline broadband providers/paths and one wireless broadband





Marlene Dortch, FCC  
March 10, 2107  
Page 3

path for delivery of critical 9-1-1 traffic from Host/Data Centers to PSAPs. We would like to see support that encourages network providers to enter this critical market for public safety.

In accordance with the Commission's rules, this letter is being filed electronically with the Secretary for inclusion in the public record in the above-referenced proceedings.

Sincerely,

A blue ink signature of Stan Heffernan, written in a cursive style.

Stan Heffernan  
Chief Operations Officer  
Greater Harris County 9-1-1

Enclosures

CC: Zenji Nakazawa